

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)
v.)
Plaintiffs,)
GOOGLE LLC,)
Defendant.)
No. 1:23-cv-00108-LMB-JFA

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C) and the Protective Order (Dkt. 98), Plaintiffs' respectfully move this Court to seal portions of Plaintiffs' motion and memorandum to compel Google to produce all data and information referred to and/or relied on by its testifying experts that identify Google's expert or reference their report, and to seal exhibits 2, 3, and portions of 4 attached to the motion and memorandum. The expert reports and exhibits contain information marked confidential by Defendant Google. Consistent with the local rule and this Court's Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled "UNDER SEAL." The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court's convenience.

Dated: February 2, 2024

Respectfully submitted,

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